

BROWN GAVALAS & FROMM LLP
Attorneys for Defendants
AMERICAN STEAMSHIP OWNERS
MUTUAL PROTECTION AND
INDEMNITY ASSOCIATION, INC. and
SHIOPWNERS CLAIMS BUREAU, INC.
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GREAT LAKES INSURANCE SE
IN ITS OWN RIGHT AND/OR AS
SUBROGEE OF PACIFIC GULF
SHIPPING CO.,

Case No.: 1:19-cv-10656 (RA)(SLC)

Plaintiff,

-against-

AMERICAN STEAMSHIP OWNERS
MUTUAL PROTECTION AND
INDEMNITY ASSOCIATION, INC.
A/K/A THE AMERICAN CLUB,
SHIOPWNERS CLAIMS BUREAU, INC.,
GEORGE GOURDOMICHALIS, AND
EFSTATHIOS GOURDOMICHALIS,

**NOTICE OF MOTION TO
DISMISS THE COMPLAINT**

Defendants.

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PLEASE TAKE NOTICE that Defendants, AMERICAN STEAMSHIP OWNERS
MUTUAL PROTECTION AND INDEMNITY ASSOCIATION, INC. and SHIOPWNERS
CLAIMS BUREAU, INC., will move this Court before the Honorable Ronnie Abrams, at the
United States Courthouse located at 40 Foley Square, New York, New York, at a date and time
to be set by the Court, for an Order, pursuant to Rules 9, 12, 37 and 65 of the Federal Rules of
Civil Procedure as well as the inherent power of the Court to fashion appropriate remedies for

violation of a protective order, dismissing the Complaint in its entirety, awarding attorneys' fees in connection with this motion and granting such further and different relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that opposition papers are required to be served and filed in accordance with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

Dated: New York, New York
December 12, 2019

BROWN GAVALAS & FROMM LLP
Attorneys for Defendants
AMERICAN STEAMSHIP OWNERS
MUTUAL PROTECTION AND
INDEMNITY ASSOCIATION, INC.
A/K/A THE AMERICAN CLUB and
SHIPOWNERS CLAIMS BUREAU, INC.

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